

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

BRAD AMOS,

Plaintiff,

vs.

**THE LAMPO GROUP, LLC and DAVE
RAMSEY,**

Defendants.

Case No: 3:21-CV-923

Judge Richardson/Holmes.

**PLAINTIFF'S UNOPPOSED MOTION TO ALTER
OR AMEND INITIAL CASE MANAGEMENT ORDER**

Plaintiff, Brad Amos, by and through undersigned counsel, moves to extend the period to complete discovery as currently set forth in the Fourth Modified Case Management Order on February 6, 2023 (Doc. No. 71). In support of this motion, Plaintiff states as follows:

1. Pursuant to the Fourth Modified Case Management Order on February 6, 2023, discovery closed in this matter on April 17, 2023.
2. The parties have exchanged all outstanding written discovery.
3. Plaintiff has requested and received voluminous records from Defendants, which Plaintiff wanted to review before completing depositions which are currently being scheduled.
4. Further, the parties believe the additional discovery will help them determine whether this matter can be resolved without the need for further time, expense or court involvement.
5. Should the district court grant Plaintiff's unopposed Motion to Continue Trial; a new scheduling order shall be set in accordance with the new trial date. However, until/if that Motion is granted, Plaintiff requests an extension for discovery which will not affect the deadline for completion of dispositive motion briefing at least 120 days prior to trial.

6. Therefore, Plaintiff requests the Fourth Modified Case Management Order be altered or amended as follows:

- a. Discovery shall be completed by May 12, 2023. Dispositive Motions shall be filed by May 12, 2023 and any responses shall be filed within 14 days. Optional replies shall be filed within 7 days after any response.¹
- b. In the alternative, Discovery shall be completed by May 5, 2023, and the current dispositive motion deadlines will remain.

WHEREFORE Plaintiff respectfully requests the court grant this Motion and amend the current scheduling order as set out herein.

Respectfully Submitted,

THE EMPLOYMENT LAW GROUP

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¹ Local rule 7.01(3) states that any responses to dispositive motions shall be filed 21 days after the motion is filed ***unless otherwise ordered by the court.*** Here Plaintiff requests the response deadline be shortened to 14 days by the court so the parties can have time to complete discovery.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was served via the Court's CM/ECF System and Certified Mail this 19th day of April, 2023 to the following:

Leslie Goff Sanders (TN #18973)

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